

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**CARROLL INDEPENDENT SCHOOL
DISTRICT,**

Plaintiff,

v.

**UNITED STATES DEPARTMENT OF
EDUCATION; ET AL.,**

Defendants.

Case No. 4:24-cv-00461-O

**APPENDIX IN SUPPORT OF CARROLL INDEPENDENT SCHOOL
DISTRICT'S REPLY IN SUPPORT OF MOTION TO DELAY EFFECTIVE
DATE AND FOR PRELIMINARY INJUNCTION**

Declaration of Lane Ledbetter, dated June 28, 2024

App.476–477

CERTIFICATE OF SERVICE

I certify that on June 28th, 2024, this document was served on all counsel of record via the Court's CM/ECF system.

/s/ Mathew W. Hoffmann

Mathew W. Hoffmann

Counsel for Plaintiff Carroll ISD

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

Carroll Independent School
District,

Plaintiff,

v.

United States Department of
Education, et al.,

Defendants.

Case No. 4:24-cv-00491-O

DECLARATION OF LANE LEDBETTER

I, Lane Ledbetter, declare as follows:

1. I am above the age of 21, and fully competent to make this declaration.
2. These facts are within my personal knowledge and are true and correct.

If called to testify, I could and would testify competently to these facts.

3. I am Superintendent of Carroll Independent School District (Carroll ISD).

4. Carroll ISD students travel outside of Texas for athletic competitions, debate tournaments, and color guard tournaments.

5. For the 2024–25 school year, Carroll ISD students plan to travel to:

- a. Ohio for a color guard tournament;
- b. Florida, Georgia, Kentucky, and Iowa for debate tournaments;
and
- c. California and Oregon for cross country meets.

6. During those events, Carroll ISD students will have to use restrooms, locker and changing rooms, and shower facilities outside of Texas.

7. In the 2024–25 school year, Carroll ISD student-athletes will regularly compete with other athletic teams inside Texas but outside of Carroll ISD. Carroll ISD student-athletes thus have to use restrooms, locker and changing rooms, and shower facilities outside of the school district.

8. Under the new Title IX regulations, Carroll ISD students thus run the risk of encountering persons of the opposite sex in these private spaces.

9. During athletic competitions outside of Carroll ISD, the district's female students may have to compete against males identifying as females, which poses safety risks and is unfair to Carroll's athletes.

Under 28 U.S.C. section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 th day of June, 2024, at Southlake, Texas.


Lane Ledbetter

Superintendent
Carroll Independent School District